

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILL MOFFETT and CURTIS BOWERS,
on behalf of themselves and all other
persons similarly situated,
known and unknown

Plaintiffs,

v.

HC AURORA, LLC and PENN
NATIONAL GAMING, INC.

Defendants.

No. 19-CV-08040

JOINT MOTION FOR ENTRY OF AGREED CONFIDENTIALITY ORDER

Plaintiffs, Will Moffett (“Moffett”) and Curtis Bowers (“Bowers”), and Defendants, HC Aurora, LLC (“HC Aurora”) and Penn National Gaming, Inc. (“Penn National,” and together with Moffett, Bowers, and HC Aurora, the “Parties”), through their respective attorneys, jointly move this Honorable Court pursuant to Fed. R. Civ. P. Rule 26(c), for entry of an Agreed Confidentiality Order, stating as follows:

1. The Parties have prepared a proposed Agreed Confidentiality Order, a copy of which is attached to this Joint Motion as Exhibit A. A redline showing all deviations from the Court’s Model Confidentiality Order is attached to this Joint Motion as Exhibit B.

2. Good cause exists for entry of the proposed Agreed Confidentiality Order. The Parties are beginning to gather and exchange potentially relevant documents and information which may be subject to the Biometric Information Privacy Act (“BIPA”), 740 ILCS 14/1 *et seq.*, and/or contain non-public, proprietary, and/or confidential information, requiring the safeguards afforded in the proposed Agreed Confidentiality Order.

3. The proposed Agreed Confidentiality Order is limited in scope and protects the dissemination and disclosure of confidential information for good cause and in furtherance of legitimate confidential and proprietary interests.

4. The Parties agree to entry of the proposed Agreed Confidentiality Order.

WHEREFORE, the Parties respectfully request that the Court enter the attached Agreed Confidentiality Order, Ex. A, and grant any other relief this Court deems fair and just.

Dated: January 28, 2020

Respectfully submitted,

WILL MOFFETT and CURTIS
BOWERS, on behalf of themselves and
all other persons similarly situated

HC AURORA, LLC and PENN
NATIONAL GAMING, INC.

/s/ Andrew D. Schlichter

/s/ Zachary R. Clark

One of Their Attorneys

One of Their Attorneys

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